## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

ELIZABETH M. MAYS and all others similarly situated,

Plaintiffs, Case No.: 14-cv-461-slc

v.

GRAND DADDY'S, LLC GERALD JULIAN MORRELL and EDWARD G. KRAIMER, JR.

Defendants.

## STIPULATION FOR CONDITIONAL CERTIFICATION

Plaintiff Elizabeth Mays, as well as all other similarly-situated individuals, by her attorneys, Terwilliger, Wakeen, Piehler & Conway, S.C. and Gingras Cates & Luebke and Defendants Grand Daddy's, LLC, Gerald Julian Morrell and Edward G. Kraimer, Jr., by their attorneys The Jeff Scott Olson Law Firm, S.C., hereby stipulate to conditional certification of the Fair Labor Standards Act class, provided that this stipulation for conditional certification will not in any way prejudice Defendants' pending motion to dismiss arising out of the plaintiff's refusal of the defendant's Rule 68 Offer of Judgment made to her on October 14, 2014.

Dated this 19<sup>th</sup> day of November, 2014. **s/Paul A. Kinne** 

Attorney Paul A. Kinne State Bar No. 1021493 Gingras, Cates & Luebke 8150 Excelsior Drive Madison, WI 53717 Telephone: 608-833-2632

Fax: 608-833-2874 kinne@gcllawyers.com

Attorney Timothy J. Burnett State Bar No. 1056498 Terwilliger, Wakeen, Piehler & Conway, S.C. 327 North 17th Avenue, Suite 301 P.O. Box 8063 Wausau, WI 54402-8063

Phone: 715-845-2121 Fax: 715-845-3538 tburnett@twpclaw.com

Dated this 19<sup>th</sup> day of November, 2014.

## s/ Jeff Scott Olson

Jeff Scott Olson The Jeff Scott Olson Law Firm, S.C. State Bar No. 1016284 131 W. Wilson St., Suite 1200 Madison, WI 53703

Phone: (608) 283-6001 Fax: (608) 283-0920 jsolson@scofflaw.com